



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
KNOXVILLE ENVIRONMENTAL FIELD OFFICE

3711 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE 37921-6538
PHONE (865) 594-6035 STATEWIDE 1-888-891-8332 FAX (865) 594-6105

June 6, 2014

The Honorable Danny Thomas
Mayor, City of Morristown
P.O. Box 1499
Morristown, Tennessee 37816-1499

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 7011157000088747022

Re: MS4 Program Audit - City of Morristown
NPDES Permit No. TNS076031
Hamblen County

Dear Mayor Thomas:

The letter that the Division of Water Resources issued to the City of Morristown, regarding the Municipal Separate Storm Sewer System (MS4) program, contained a grammatical error. The letter that has been issued is dated May 22, 2014, and the final paragraph in the letter should read as follows:

*Again, the Division appreciates the cooperation shown during the inspection. Please provide this office, by **July 31, 2014**, a formal plan of action that the City of Morristown will take to address these issues. If you have any questions or comments, please contact me at (865) 594-1077 or Jason.Mann@tn.gov.*

Please take note that the response deadline differs from that listed in the initial inspection letter. The Division recognizes the complexity of the MS4 program and appreciates the integrity Morristown is showing in this regard.

If you have any questions or comments regarding this update, please feel free to contact Jason Mann via phone or email.

Sincerely,

Jason Mann
Tennessee Division of Water Resources

Attachment: Inspection Letter Dated May 22, 2014

cc: Jim Whitbeck, City of Morristown (e-copy)
Tony Cox, City of Morristown (e-copy)
Larry Clark, City of Morristown (e-copy)



FILE COPY

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May 22, 2014

The Honorable Danny Thomas
Mayor, City of Morristown
P.O. Box 1499
Morristown, Tennessee 37816-1499

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 7011157000088747015

Re: MS4 Program Audit
City of Morristown
NPDES Permit No. TNS076031
Hamblen County

Dear Mayor Thomas:

On May 5, 2014, Division personnel from the Knoxville Environmental Field Office initiated an audit of the City of Morristown's Municipal Separate Storm Sewer System (MS4) program to review compliance with NPDES Permit Number TNS076031. The Division appreciates the cooperation of program staff throughout the inspection process; Jim Whitbeck was in attendance of the audit, and able to provide information and details necessary to conduct a thorough inspection.

The following is a list of issues that the City of Morristown must address to comply with the terms and conditions of TNS076031:

1. In accordance with Illicit Discharge Detection and Elimination requirements in the permit, dry weather screenings must be conducted within the storm system in order to detect, identify, and eliminate non-storm water discharges. A formal schedule of dry weather screenings should be developed and implemented (Section 4.2.3).
2. The Public Education component of the permit requires targeted educational campaigns be designed to inform multiple stakeholder groups on stormwater-related issues; chemical applicators, home owners associations, and the local engineering community are some of the groups listed in this permit requirement. The audit findings show no such educational campaigns being conducted at this time (Sections 4.2.1.a - 4.2.1.h).
3. The City of Morristown has not developed a monitoring program in watersheds listed on the 303(d) list of impaired waterways. Both analytical and non-analytical monitoring is required for Turkey Creek, and a monitoring program must be developed and implemented as soon as possible to meet the terms and conditions of the NPDES permit (Sections 5.1 & 5.2).

The Honorable Danny Thomas

City of Morristown

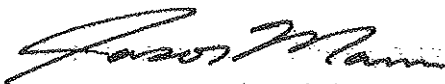
May 22, 2014

Page 2

4. The Pollution Prevention/Good Housekeeping component of the MS4 permit requires an operation and maintenance plan be developed for individual municipal facilities within a given jurisdiction. First, the City of Morristown must develop a comprehensive list of municipal facilities, then develop operation and maintenance plans to comply with the terms and conditions of TNS076031 (Section 4.2.6).
5. Currently, the City of Morristown is not inspecting active construction sites on a monthly basis as specified in the Storm Water Management Plan. The MS4 permit requires monthly inspections on all sites discharging to high quality waters and impaired waters (Section 4.2.4.j).
6. A formal set of Standard Operating Procedures (SOP) should be developed to aid stormwater staff and to consistently implement the program. The Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, and Permanent Stormwater Management components of the program must be uniformly applied, and a formal SOP will aid in that process.
7. Currently, the City of Morristown has 4 separate ordinances addressing stormwater-related subjects; in those ordinances, 2 separate governing bodies are named for hearing appeals to stormwater regulations. An ordinance update/consolidation might be appropriate to better serve citizen's needs within the City of Morristown.

Again, the Division appreciates the cooperation shown during the inspection. Please provide this office, by March 28, 2014, a formal plan of action that the City of Morristown will take to address these issues. If you have any questions or comments, please contact me at (865) 594-1077 or Jason.Mann@tn.gov.

Sincerely,



Jason Mann
Tennessee Division of Water Resources

cc: Jim Whitbeck, City of Morristown (e-copy)
Tony Cox, City of Morristown (e-copy)
Larry Clark, City of Morristown (e-copy)
Paul Brown, City of Morristown (e-copy)